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February 26, 2009

BY ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., TW-A325  
Washington, D.C. 20554

Re: EB Docket No. 06-36  
Annual Certification of TDS Telecommunications Corporation

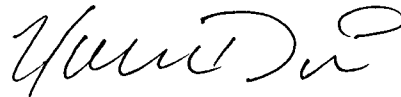
Dear Ms. Dortch:

TDS Telecommunications Corporation, by its attorneys and on behalf of the wholly-owned subsidiaries identified in this submission (collectively, "TDS"), hereby files its annual CPNI certification pursuant to the requirements of Section 64.2009(e) of the Commission's rules.

This submission has been redacted for public inspection, as permitted by the *Report and Order* released by the Commission in the above-referenced docket on April 2, 2007. *See In re Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, 22 FCC Rcd 6927, 6954, n.167 (2007). A confidential, unredacted version of this submission will be filed today by hand.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,



Yaron Dori  
*Counsel for TDS*

cc: Enforcement Bureau, Telecommunications Division (two copies)  
Best Copy and Printing, Inc. (one copy)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008 Calendar Year**  
**EB Docket No. 06-36**

Date: February 23, 2009

Companies covered by this certification: Wholly owned telecommunications subsidiaries of TDS Telecommunications Corporation as of December 31, 2008 with the exception of State Long Distance Telephone Company.<sup>1</sup>

Form 499 Filer IDs: Please see the attached list

Signatory Name: James W. Butman

Signatory Title: Group President of Sales, Marketing and Customer Operations, TDS Telecommunications Corporation

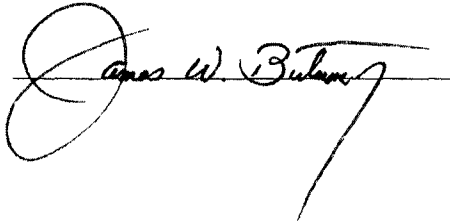
I, James W. Butman, certify that I am an officer of TDS Telecommunications Corporation, and acting as an agent of the company, that I have personal knowledge that the wholly owned telecommunication subsidiaries (Companies) have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company did not receive any customer complaints for the 2008 calendar year concerning the unauthorized release of CPNI.

Signed: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "James W. Butman", written over a horizontal line.

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<sup>1</sup> State Long Distance Telephone Company, acquired by TDS Telecommunications Corporation on December 1, 2008, completed a separate CPNI certification for the 2008 calendar year and filed that certification with the Commission on January 20, 2009.

TDS Telecommunications Corporation ("TDS" or "Company") takes seriously its duty to protect customer privacy. TDS complies with Section 222 of the Communications Act of 1934 and all of the FCC's CPNI rules as described below.

#### **Marketing Use of CPNI Information**

Consistent with the Commission's rules, TDS uses CPNI to market service offerings to our customers that are within the category of service to which the customer already subscribes ("Total Service Approach"), or to market services formerly known as adjunct-to-basic services, such as speed dialing, call blocking, call return, repeat dialing, call waiting, caller ID, and call forwarding. In instances where TDS seeks to use CPNI outside of the Total Service Approach, TDS follows Commission rules to obtain customer approval to do so. TDS uses the Opt-Out approach or one-time permission method to obtain customer permission in accordance with FCC rules. Record of customer opt-out selection is maintained TDS systems to ensure the customer records are used only as permitted by law.

#### **Supervisory Review Process**

TDS has a supervisory review process for sales and marketing campaigns using CPNI. A manager trained in the CPNI marketing rules reviews requests for marketing lists. If the requested marketing list is permitted under the CPNI rules, it is created and retained for a minimum of one year. If the requested list is not permitted under the CPNI rules, the request is denied.

#### **Training and Education**

TDS trains its personnel regarding when they are, and are not, authorized to use or disclose CPNI.

#### **Passwords**

TDS password systems are Personal Identification Number ("PIN") and security question and answer based. [REDACTED]

The system also allows customers to select a security question and answer [REDACTED]

47 C.F.R. §64.2010(e) prohibits carriers from using readily available account or biographical information to establish a password on an existing account. To assist customers to establish passwords and comply with this requirement [REDACTED]

TDS customers have the ability to enroll in TDS ePay, the Company's on-line bill payment and presentation application. The system prevents customers from using readily available account or biographical information in their passwords.

47 C.F.R. §64.2010(c) requires carriers to authenticate customers before allowing them online access to CPNI. That provision also prohibits carriers from authenticating customers using readily available biographical or account information. A new application was created to comply

with this provision. [REDACTED]

[REDACTED] After the ePay system verifies a customer's identity, the customer then establishes an ePay password.

**Notification of Account Changes:**

TDS notifies customers whenever a password, on-line account, or address of record is created or changed on an existing account. [REDACTED]

[REDACTED] Customer service representatives also use this information to ensure that they send protected information to the customer they use the customer's address of record.

As required by 47 C.F.R. § 64.2010(f), notifications do not reveal the changed information.

**Breach Monitoring:**

TDS has an escalation process to investigate and, if appropriate, report unauthorized release of customer account information. Any employee may initiate an investigation and any such investigation is documented. Disciplinary action, up to and including termination, may result if an employee discloses protected information to unauthorized parties.

**Policy & Process**

Under written TDS policy, [REDACTED]

[REDACTED]  
Violating TDS policies can result in disciplinary action, up to and including termination.

Company policies are communicated in writing to all employees when they join TDS and on an annual basis thereafter. Every employee must acknowledge that he or she has read and understood the policies.

TDS has numerous operational processes regarding how customer service representatives assist callers. Those processes are designed to comply with the password authentication requirements contained in § 64.2010 of the Commission's rules. Customer identity is verified prior to disclosing CPNI when receiving an in-bound call or assisting customers at a business office.

- Customer service representatives receiving in-bound calls attempt to authenticate all callers using their password.
- Where passwords do not exist on the account or cannot be remembered, the TDS customer service representative will not discuss password protected information, unless the representative can return the customer's call by contacting the customer at his or her telephone number of record.
- Either passwords or valid photo identification is used to verify customer identity at business offices.

TDS Telecom - Operating Companies

<b>Company Name</b>	<b>499 Filer ID</b>
Amelia Telephone Corporation	806607
Arcadia Telephone Company	806544
Arizona Telephone Company	805434
Arvig Telephone Company	806766
Asotin Telephone Company	805437
Badger Telecom, LLC	805563
Barnardsville Telephone Company	806562
Black Earth Telephone Company, LLC.	805560
Blue Ridge Telephone Company	806634
Bonduel Telephone Company, LLC.	805566
Bridge Water Telephone Co.	804465
Burlington, Brighton & Wheatland Telephone Company, LLC	805569
Butler Telephone Company, Inc.	806589
Calhoun City Telephone Company, Inc.	806637
Camden Telephone and Telegraph Company, Inc.	806823
Camden Telephone Company, Inc.	802068
Central State Telephone Company, LLC	805572
Chatham Telephone Company	806523
Cleveland County Telephone Company, Inc.	805440
Cobbosseecontee Telephone Company	801201
Communications Corporation of Indiana	806559
Communications Corporation of Michigan	806526
Communications Corporation of Southern Indiana	806556
Concord Telephone Exchange, Inc	806604
Continental Telephone Company	806541
Decatur Telephone Company, Inc.	805443
Delta County Tele-Comm, Inc.	805446
Deposit Telephone Company, Inc.	801840
Dickeyville Telephone, LLC	807810
EastCoast Telecom of Wisconsin, LLC	805575
Edwards Telephone Company, Inc.	806781
The Farmers Telephone Company, LLC	807813
Grantland Telecom, LLC	805578
Hampden Telephone Company	803232
Happy Valley Telephone Company	805449
Hartland & St. Albans Telephone Company	806802
Hollis Telephone Company, Inc.	809570
Home Telephone Company	805452
The Home Telephone Company of Pittsboro, Inc.	806550
Home Telephone Company, Inc.	806553
Hornitos Telephone Company	805455
Humphreys County Telephone Company	806565
Island Telephone Company	806529
Kearsage Telephone Company	806796
Leslie County Telephone Company	806619
Lewis River Telephone Company, Inc.	807207
Lewisport Telephone Co.	806625
Little Miami Communications Corporation	806547
Ludlow Telephone Company	806805
Mahanoy & Mahantango Telephone Company	806808

TDS Telecom - Operating Companies

<b>Company Name</b>	<b>499 Filer ID</b>
McClellanville Telephone Company, Inc.	806586
McDaniel Telephone Company	804768
The Merchants and Farmers Telephone Company	809001
Merrimack County Telephone Company	808275
Mid-America Telephone, Inc.	805461
Mid-Plains Telephone, LLC	806862
Mid-State Telephone Company	805585
Midway Telephone Company, LLC	805581
Mt. Vernon Telephone Company, LLC	805584
Mosinee Telephone Company, LLC	808410
Mosinee Telecom, LLC	825970
Myrtle Telephone Company, Inc.	805866
Nelson-Ball Ground Telephone Company	802134
New Castle Telephone Co.	806628
New London Telephone Company	805464
Northfield Telephone Company	806793
Norway Telephone Co. Inc	806574
Oakman Telephone Company, Inc.	806580
Oakwood Telephone Company	806538
Oklahoma Communication Systems, Inc.	805467
Orchard Farm Telephone Company	805470
Oriskany Falls Telephone Corporation	806814
Peoples Telephone Company, Inc.	806631
Perkinsville Telephone Company, Inc.	806790
Port Byron Telephone Company	806817
Potlatch Telephone Company, Inc.	805473
Quincy Telephone Company	806583
Riverside Telecom, LLC	805587
S & W Telephone Company, Inc.	801558
Salem Telephone Co.	806622
Saluda Mountain Telephone Co.	806616
Scandinavia Telephone Company, LLC	805590
Service Telephone Co.	806601
Shiawassee Telephone Company	806532
Somerset Telephone Company	806799
Southeast Mississippi Telephone Company, Inc.	806577
Southeast Telephone Co. of Wisconsin, LLC	808374
Southwestern Telephone Company	805377
St. Stephen Telephone Company	806592
Stockbridge & Sherwood Telephone Company, LLC	805593
The Stoutland Telephone Company	805476
Strasburg Telephone Company	805479
Sugar Valley Telephone Company	806775
TDS Metrocom, Inc.	817212
TDS Long Distance	820658
Tellico Telephone Company, Inc.	806613
Tennessee Telephone Company	806610
Tenney Telephone Company, LLC	805596
The Island Telephone Company	806820
The Vanlue Telephone Company	808419

TDS Telecom - Operating Companies

<b>Company Name</b>	<b>499 Filer ID</b>
Tipton Telephone Company, Inc.	804819
Township Telephone Company, Inc.	808425
Tri-County Communications Corporation	801264
US Link, Inc.	809008
Utelco, LLC.	801945
Vernon Telephone Company, Inc.	809218
Virginia Telephone Company	806568
Warren Telephone Company	806787
Waunakee Telephone Company, LLC.	805602
Westpoint Telephone Company, Incorporated	809790
The West Penobscot Telephone and Telegraph Company	806784
Williston Telephone Company	806598
Wilton Telephone Company, Inc.	809034
Winsted Telephone Company	806409
Winterhaven Telephone Company	805485
Wolverine Telephone Company	806535
Wyandotte Telephone Company	805488